

This document includes remarks prepared for the FCC Public Forum on TRS 10/10/01 concerning CC Docket 98-67. This meeting was delayed until Spring, 2002.

I am grateful for Sprint's support of my effort to educate the TRS community about the necessity for adequate STS outreach. Right now STS call volumes are extremely low. PUCs and many STS providers do not carry out adequate STS outreach.

Currently, STS outreach only occurs in a small group of states where the Relay Contract Administrator, the STS vendor, and/or consumer groups took the initiative to establish an effective STS outreach service. Such services can cost \$100,000 or more annually.

Many Relay Contract Administrators appear to be waiting for STS users to lobby them to establish STS outreach services. Unfortunately, most STS consumers and the organizations that protect them are not in a position to do such lobbying. Given that none of these groups lobby significantly for STS outreach, outreach will not take place unless the FCC requires it.

LOCATING USERS

Looking for potential STS users is like looking for needles in a huge hay stack. People with speech disabilities (PSD) are not a community as the deaf are. Most PSDs in any city do not know each other and often can not understand each others' speech.

BARRIERS TO DEVELOPING STS OUTREACH IN EACH STATE

Lack of consumer advocacy is a primary barrier to the development of adequate STS Outreach in most states. Many people with speech disabilities (PSDs) have other disabilities which prevent them from being effective advocates. The agencies which advocate for PSDs on other issues lack resources to provide advocacy for STS outreach. This lack of advocacy has impeded the development of STS Outreach services in most states.

Agencies which might be approached for assistance include:
Speech Language Hearing Associations (State/National), United Cerebral Palsy (Local/ State/National, Rehabilitation Hospitals, Head Injury Associations, Cancer Associations, Laryngectomy Associations and ALS Associations.

CURRENT FCC REQUIREMENTS

State PUCs and providers must provide STS outreach. The FCC's Rules and Regulations of 03-06-00 "clarify that the existing rule requires outreach to all callers and for all forms of TRS." This FCC document further states: "We also believe that use of STS will increase with aggressive outreach efforts to the nation's 2.7 million citizens with speech disabilities."

A GOOD INITIAL EFFORT TOWARD EFFECTIVE OUTREACH

We know that STS call volume rises when effective outreach is in place. California and Minnesota have the highest per capita call volume in the nation. Californians make about 5,000 STS calls a month and Minnesotans make about 800 calls a month. For a population, many of whom have never used the telephone before, this call volume is an accomplishment.

Please understand, however, that both California and Minnesota have only touched the tip of the iceberg. Perhaps 200 people use STS in California, while an estimated 50,000 people could be using STS in California. Hundreds of thousands of Americans are deprived the use of STS because of insufficient outreach.

STS outreach work has shown that peer education can be very effective. Positive results often occur when a person who uses STS actually demonstrates how it works to peers, caretakers and medical professionals. In addition one-on-one education of potential users is most effective. It is very difficult to gather potential users in groups given their transportation barriers.

Minnesota's STS Outreach service costs \$110,000 annually. This service provides two fulltime outreach staff who visit consumers in their home to teach them about STS. Many potential STS consumers do not respond to generic outreach efforts but respond to this training. These outreach workers also give public lectures. If every state had a per capita budget similar to Minnesota's, STS call volumes would rise significantly.

Given the high cost of STS itself, a \$110,000 outreach budget for Minnesota (population: 5 million) is not expensive. For those states that can not afford \$110,000, I designed a \$15,000 STS outreach program as a stop gap measure (E-mail me at bseglama@dor.ca.gov for details). Two states may try this program out soon.

Several other Sprint Relays support STS outreach. Both Washington State and Oregon have part-time outreach workers and Nevada has made STS outreach efforts. Sprint sponsored a series of presentations on STS in South Carolina and the resulting rise in call volume has maintained. Texas has issued an RFI for an extensive STS outreach service.

United Cerebral Palsy, Sprint, the Attainment Company and the American Speech Language Hearing Association have all supported presentations on STS at many state and national conventions and local functions.

RECOMMENDATIONS

The FCC should assist the speech disabled community by requiring that effective STS outreach is conducted nationally. When telephone consumers cannot protect themselves, the FCC should protect them. The concept of universal service requires that people have a right to be informed about telephone service appropriate to their disability and to be taught how to use it. Effective national STS outreach should be one of the FCC's universal goals. I strongly recommend that the FCC require all states to work with their STS provider to provide effective STS outreach and consumer training.

Bob Segalman, Ph.D.
Founder of Speech to Speech